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Wimbledon Fund SPC (Class TT)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

THE WIMBLEDON FUND, SPC (CLASS TT),

C.D. Cal. Consolidated Case No. 2:15-cv-6633-CAS-AJWx

Plaintiff,

vs.

GRAYBOX, LLC; INTEGRATED
ADMINISTRATION; EUGENE SCHER,
AS TRUSTEE OF BERGSTEIN TRUST;
CASCADE TECHNOLOGIES CORP., and
THE LAW OFFICES OF HENRY N.
JANNOL.

Defendants

**PLAINTIFF'S NOTICE OF
MOTION FOR SUMMARY
JUDGMENT**

Hearing:

Date: May 13 2019

Time: 10:00 a.m.

Location: Courtroom 8D

Judge: The Honorable

Christina A. Snyder

Trial date: June 25, 2019

THE WIMBLEDON FUND, SPC (CLASS TT).

Plaintiff.

VS.

DAVID BERGSTEIN; JEROME SWARTZ; AARON GRUNFELD; and KJARASH JAM..

Defendants

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on May 13, 2019, or as soon thereafter as may
3 be heard before the Honorable Christina A. Snyder, in Court Room 8D of the above-
4 entitled Court located at 350 W. First Street, Los Angeles, California 90012, Plaintiff
5 The Wimbledon Fund, SPC (Class TT) ("Class TT") will and hereby does move,
6 pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, for summary
7 judgment against defendants Kiarash Jam ("Jam") and Integrated Administration
8 ("IA").

9 Pursuant to Local Rule 7-3, on April 1, 2019, Class TT's counsel, James W.
10 Walker and Eric S. Latzer, conferred with Jam and IA's counsel, David Wiechert and
11 William Migler, regarding Class TT's filing of this Motion. Counsel thoroughly
12 discussed the substance of the contemplated motion and any potential resolution.

13 This Motion is based upon this Notice, the Memorandum of Points and
14 Authorities, the Declaration of James W. Walker, and the Statement of
15 Uncontroverted Facts and Conclusions of Law, and such further evidence and/or
16 argument as may be presented at or prior to the hearing on the Motion.

18 Dated: April 10, 2019

PACHULSKI STANG ZIEHL & JONES LLP
-and-
COLE SCHOTZ P.C.

21 By: /s/ James W. Walker

22 James W. Walker (admitted *pro hac vice*)
23 Cameron A. Welch (admitted *pro hac vice*)
24 Eric S. Latzer (admitted *pro hac vice*)
25 Attorneys for Plaintiff,
The Wimbledon Fund, SPC (Class TT)